

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GREATBATCH LTD.,

Plaintiff,

v.

AVX CORPORATION and
AVX FILTERS CORPORATION,

Defendants.

C.A. No. 13-cv-723-LPS

**GREATBATCH'S MOTION TO EXCLUDE OPINIONS
OF AVX'S EXPERT WITNESSES WILLIAM J. RISSMANN,
JOHN G. WEBSTER, AND PHILIP GREEN ON DESIGN
ALTERNATIVES, AND JEFFREY S. AROY ON PRICING**

Pursuant to the Court's Amended Scheduling Order (D.I. 79), the Federal Rules of Civil Procedure, and the Federal Rules of Evidence, Plaintiff Greatbatch Ltd. hereby moves:

- 1) to exclude opinions of Defendants AVX Corporation and AVX Filters Corporation's expert witness William J. Rissman on the issue of design alternatives;
- 2) to exclude opinions of Defendants AVX Corporation and AVX Filters Corporation's expert witness John G. Webster on the issue of design alternatives;
- 3) to exclude opinions of Defendants AVX Corporation and AVX Filters Corporation's expert witness Philip Green on the issue of design alternatives; and
- 4) to exclude opinions of Defendants AVX Corporation and AVX Filters Corporation's expert witness Jeffrey S. Aroy on the issue of pricing.

This motion is based on the Memorandum of Law and the Declaration of James R. Muldoon with exhibits thereto, filed herewith.

Dated: September 11, 2015

Respectfully submitted,

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